

Big enough to deliver. Small enough to care.

FEB 26 2015

FCC Mail Room

608 Main • P.O. Box 147 • Everest, KS 66424 • (785) 548-7511 • Toll Free (800) 892-0163 • www.rainbowtel.net

February 16, 2015

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street S.W., Suite TW-A325 Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RE: Certification of CPNI Filing, March 1, 2015 FCC Docket EB 06-36 EB-06-TC-060 Rainbow Communications, LLC

In accordance with the Public Notice issued by the Enforcement Bureau on February 2, 2006 (DA 06-258), please find attached <u>Rainbow Communications, LLC.</u> annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI).

Should you have any questions regarding this filing, please direct them to the undersigned or Beverly Armstrong at 785/548-7511.

Sincerely,

James Lednicky, President

Rainbow Communications, LLC.

Cc:

Federal Communications Commission, Enforcement Bureau, Telecommunications Consumers Division, 445 12<sup>th</sup> Street SW, Washington, DC 20554

Best Copy and Printing, Inc., 445 12th Street, Suite CY-B402, Washington, DC 20554

## Attachment A Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of Rainbow Communications, LLC. (Form 499 Filer Id No. 825493) (the "Company") ensure that the Company complies with Part 64, Section 2001 *et.seq.* of the FCC rules governing the use of Customer Proprietary Network Information ("CPNI").

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.

## Annual 47 C.F.R. § 64.2009 (e) CPNI Certification

FEB 26 2015

## EB Docket 06-36

FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2015

Date filed: February 16, 2015

Name of company covered by this certification: Carson Communications LLC

Form 499 Filer ID: 825493

Name of signatory: James Lednicky

Title of signatory: President

I, James Lednicky, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, see Attachment A.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instance of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed James

CL 53-14 KANSAS SECRETARY OF STATE

Limited Liability Company Certificate of Amendment

CONTACT: Kansas Office of the Secretary of State

Memorial Hall, 1st Floor 120 S.W. 10th Avenue Topeka, KS 66612-1594

(785) 296-4564 kssos@sos.ks.gov www.sos.ks.gov 0835 01 053 015 \$35.00

FILED BY KS SOS 08-04-2014 12:12:53 PM FILE#: 2646552



12720100

Above space is jor office use only.



INSTRUCTIONS: All information must be completed or this document will not be accepted for filing. Please read instructions before completing.

| 1. Business entity ID number:<br>This is not the Federal Employer<br>ID Number (FEIN)   | 2646552   |
|---|---|
| 2. Name of the limited liability company: Name must match the name on record with the Secretary of State  | Carson Communications, L.L.C.   |
| 3. The limited liability con  | npany amends its articles of organization as follows:                                       |
| Amending the articles to change the name from Carson Communications, L.L.C. to "Rainbow Communications, L.L.C."   |   |
| ~   | *   |
| e di a  |   |
| 4. Future effective date: A future effective date must be within 90 days of filing date   | ✓ Upon filing         ☐ Future effective date   |
| E I declare under nonalty   | of perjury under the laws of the state of Kansas that the foregoing is true and correct and |
| that I have remitted the rec  |   |
| 11/10   | 8/04/2014   |
| Signature of authorized person  |   |
| James M. Capli  | inger, Jr.  |
| Name of signer (printed or type   | d)  |
| Instructions:  I hereby certify this to be a true and correct copy of the original op file.  Certified on this date: 8-4-2014  KRIS W. KOBACH Kull Holand  Secretary of State |   |
| STAY UP-TO-DATE ON YOU  | UR ORGANIZATION'S STATUS, ANNUAL REPORT DUE DATE AND CONTACT ADDRESSES BY GOING TO          |

K.S.A. 17-7674 K.S.A. 17-76,124

WWW.SOS.KS.GOV. UNDER QUICK LINKS, SELECT SEARCH BUSINESS ENTITY INFORMATION.

NOTICE: There is a \$25 service fee for all checks returned by your financial institution.

All information must be completed or this document will not be accepted for filing.